



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

**5 Post Office Square, Suite 100
Boston, MA 02109-3912**

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

AUG 10 2011

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Clare C. Hampford Donohue, President
Hampford Research Inc.
54 Veterans Boulevard
Stratford, CT 06615

Re: Clean Air Act Reporting Requirement for Hampford Research - West Broad Street Facility

Dear Ms. Donohue:

The United States Environmental Protection Agency ("EPA") is evaluating whether the Hampford Research, Inc. ("Hampford") facility located at 1255 West Broad Street in Stratford, Connecticut is in compliance with applicable state and federal requirements under the Clean Air Act ("the Act").

Hampford is a custom manufacturer of electronics and dental chemical additives, specialty monomers, photoinitiators, and other specialty organic chemicals. The West Broad St. facility is subject to the State of Connecticut's federally-enforceable state implementation plan under the Act, found at Connecticut Abatement of Air Pollutant Regulations 22a-174-1 through 43. Hampford's facility is also subject to Section 608 of the Act, which regulates emissions of refrigerants that damage the stratospheric ozone layer. Specifically, this facility is subject to the Recycling and Emissions Reduction regulations found at 40 C.F.R. Part 82, Subpart F.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Act. EPA issues this Reporting Requirement under the authority of Section 114(a)(1) of the Act.

Within 30 days of receiving this Reporting Requirement, Hampford shall submit the information described in Attachment A to:

Susan Studlien, Director
Office of Environmental Stewardship

U.S. Environmental Protection Agency
5 Post Office Sq. Suite 100 (OES04-2)
Boston, Massachusetts 02109-3912
Attn: Abdi Mohamoud

and to

Robert Girard, Assistant Director
Air Compliance and Field Operation
CT Department of Environmental Protection
79 Elm Street, Hartford, CT 06106-5127

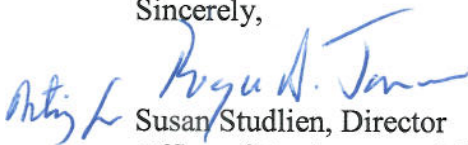
Be aware that if Hampford does not provide the requested information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

Hampford may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. §2.203(b). Note that certain categories of information, such as emission data, are not properly the subject of such a claim. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Hampford. Be aware that state law may have different provisions regarding confidential business information.

Please note that, under separate cover, EPA is sending Hampford an Administrative Order and Reporting Requirement concerning the facility located on Veteran's Boulevard in Stratford, Connecticut.

If you have any questions regarding this Reporting Requirement, please contact Environmental Engineer Steve Rapp at (617) 918-1551, or have your attorney call Senior Enforcement Counsel Thomas Olivier at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

CC: Bob Girard, CT DEP

Attachment A: EPA Reporting Requirement for Hampford Research's West Broad Street, Stratford, CT, Facility

Provide a separate numbered response to each numbered paragraph or subparagraph below. Provide answers to each of the items in numbered paragraphs.

1. Provide a list and description of all chemical manufacturing equipment currently located at Hampford's 1255 West Broad Street facility ("Facility") in Stratford, CT, including:
 - a. the manufacturer's name and model number; and
 - b. the purpose of the equipment;
 - c. the date that each piece of equipment was purchased;
 - d. the date and location in the Facility where the equipment was installed (or stored if the equipment has not yet been installed); and
 - e. the maximum capacity of the equipment, including throughput.
2. Provide Facility-wide actual monthly VOC and HAP emissions, listed by individual VOC and HAP (if known), from July 1, 2006 to the present.
3. State whether Hampford owns or operates a chemical manufacturing process unit ("CMPU"), as defined at 40 C.F.R. §63.11494(b), at the Facility. If so, for each CMPU at the Facility, state whether:
 - a. The CMPU uses as feedstocks, generates as byproducts, or produces as products any of the HAPs listed in Table 1 to 40 C.F.R. Part 63, Subpart VVVVVV. For each applicable HAP, identify whether it is used in feedstock, generated as byproduct, or produced as product;
 - b. The CMPU is located at an area source of HAP emissions;
 - c. Table 1 HAPs are present in feedstocks, or Table 1 HAPs are generated or produced in the CMPU and are present in process fluid, at concentrations greater than 0.1 percent for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. To determine the Table 1 HAP content of feedstocks, you may rely on formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material. If the concentration in an MSDS is presented as a range, use the upper bound of the range;
 - d. Hampford conducts any of the operations listed in 40 C.F.R. §63.11494(c)(1) through (6).
4. Provide copies of all correspondence between Hampford and the Connecticut Department of Environmental Protection concerning the Facility's air emissions, including: permit

applications, letters, emails, or phone records concerning changes to existing process equipment, addition of equipment, calculations of changes to potential emissions due to changes in equipment, etc.

Ozone Depleting Substances:

5. Identify the refrigerant used at the Facility and indicate whether the refrigerant is a Class I or Class II substance or their substitutes.
6. Provide the name(s) of all employees of Hampford who maintain, service, remove, repair, or dispose of appliances which contain and use a Class I or Class II substance as a refrigerant at the Facility. Provide the date of certification for each technician. Indicate the level of certification, and provide a copy of each technician's certificate.
7. Provide the name, address, and telephone number of each person, agent, or business entity from whom Hampford purchased refrigerant for use at the Facility and provide records indicating the amount of refrigerant purchased from January 1, 2006 to present.
8. List the appliances at the Facility with refrigerant capacities of more than 50 pounds that contain and use a Class I or Class II refrigerant or their substitutes. Identify whether each unit is an industrial refrigeration unit, commercial refrigeration unit, comfort cooler, or other type. If another type, please explain its function.
9. For each appliance referenced in question 8, state the quantity of refrigerant (in pounds) the appliance holds at full charge, the type of refrigerant used, and the date the full charge was most recently determined.
10. For each appliance referenced in question 8, provide a description of its location within the Facility, along with its name, serial number, or other identification used by Hampford.
11. For each appliance referenced in question 8, provide copies of any and all work logs, service tickets, invoices, and any other documents maintained by Hampford and relating to service and repair between January 1, 2006 and the present. Such records shall include:
 - a. the date any service was performed;
 - b. the date each leak was discovered and amount of refrigerant that leaked.
 - c. a detailed description of all repair work done in association with each leak (if repairs were not conducted, explain why);
 - d. the date each repair was conducted;
 - e. the amount of refrigerant added; and
 - f. the name of the technician who performed the work.

[End, Attachment A]